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In The United States District Court
FOR The Northern District of Mississippi
Greenville Division

Darren Lang, et al.

Plaintiffs

v

NO: 4:20-cv-30 -DMB -JMV

Jeworski Mallet, et al.

Defendants

MOTION FOR TRO/PRILIMINARY INJUNCTION

Comes now the Plaintiff Kedric F. Steele Class member in the above-entitled actions, and moves this court for an order TRO/Preliminary Injunction. In support of this motion, the Plaintiff would show as follows. Pursuant to Rule 65(a)(6) Fed. R. Civ. P.

1.) Plaintiff submits On 12/30/21 at M.S.P. Unit 30

gym staff officer Michael Honeycutt acting under color of state law, unlawfully seized and confiscated Plaintiff's family value and personal property, courts material and supplies ~~NECESSARY~~ for his access to courts. Without giving Plaintiff due process of M.O.D.C. policy and procedure to have his property

put in a storage room or sent home.

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- 2.) M.S.P. Staff Micheal Honeycutt force Plaintiff to throw his counts legal documents, supplies and personal family value things in the trash can.
- 3.) M.S.P. staff Micheal Honeycutt was aggressive with verbal threats words against Plaintiff, results in verbal assault.
- 4.) I, Plaintiff was mental frightened with shock and embarrassment as been humiliated in front of other, staff, K-9 officials looking as well as other prisoners.
- 5.) Defendants M.S.P. Staff Micheal Honeycutt have a prison weak record history of Verbal and physical assaulting Prisoner's here at Parchman. The M.S.P. Superintendent, Unit 30 wardens knows about this staff member unprofessional conduct and his assaults on prisoners. Failed to CORRECT his actions.
- 6.) Plaintiff states he already have a (ARP) complaint pending against K-9 staff for excess force abuse.
- 7.) Defendants M.S.P. Staff Micheal Honeycutt acted intentionally or purposefully to deprive

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the plaintiff of his property rights. Staff Micheal Honeycutt abused his official power under color of state law or took unfair advantage of the Plaintiff. Staff Micheal Honeycutt acted reckless disregard of or with callous indifference to the Plaintiff's property rights.

- 8.) Plaintiff's constitutional rights under the 4th, 5th, 8th and 14th Amendment was violated by M.S.P. staff official's.
 - A.) 4th No person shall have their property unlawful seized and destroyed without written compliance.
 - B.) 5th, 14th No person shall be deprive of property without due process of law.
 - C.) 8th No person shall be subjected to cruel and unusual punishment.
- 9.) Deprivation or limitation of property, in Retaliation for the exercise of constitutional rights is unconstitutional. (Bell v. Wolfish, 441 U.S. 555-55 (1979) Augustine v. Doc, 740 F.2d 322, 325-27 (5th Cir. 1984) Long v. Collins, 917 F.2d 3, 4 (5th Cir. 1990) Zineaman v. Burch, 494 U.S. 113, 138 (1990)

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10.) The Constitution is the ultimate expression of the Public Interest. In this case, the grant of relief will serve the public interest because it is always in the Public interest for Prison officials to obey the law, respect for law, particularly by officials responsible for the administration of the state's correctional system, is in itself a matter of the highest Public interest.

11.) Prisoners will suffer "irreparable" injury without an injunction, prisoners Constitutional Rights are likely to be violated is usually enough to meet the irreparable harm requirement. (see. Winter V. Natural Resources Defense Council, Inc., 129 S. Ct at 375 (2008))

Institutionalized Persons Prohibition of Retaliation 42 U.S.C.A. § 1997d (1980)

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FOR the foregoing reasons, the court
should grant the Plaintiff motion in
all respects.

Pursuant to 28 U.S.C. 1746, I declare
under penalty of perjury that the foregoing
is true and correct.

Respectfully Submitted
151 Kedric & Steele
Plaintiff

Date: 12/12/21

Certificate of Service

I, Kedric F. Steele do hereby certify that I have mailed a true, and correct copy of the foregoing motion for TRO1 Preliminary Injunction By placing in U. S. Mail, Postage Prepaid to the following individuals, address(es):

U.S. District Court, Clerk
203 Gilmore Drive
Amory, MS 38821

Mississippi Attorney
General
P.O. Box 220
Jackson, MS 39205

Monon Marvel Bradley
Anderson + Tandy, LLC
1020 Highland Colony Parkway
Ridgeland, MS 39157

United States District Court
Northern District of Miss
Greenville Division
305 Main Street
Room 329
Greenville, MS 38701

So Certified, this the 07 day of December 2021

Kedric F. Steele
Plaintiff

In The United States District Court
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
Greenville Division

NO. 4:20-CV-30-DMB-JMV

Dear United States District Court
Clerk, I am filing a Motion for TRO/
Preliminary Injunction. Please file and
send me a notice back. Thanks and May
God Bless you and your family.

Respectfully Submitted
Kedric F Steele
M.S.P.
30 B building A zone Bed #18
P.O. Box 1059
Prachman, MS 38738